

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ROBERT BROWN and THE ESTATE OF BOBBI	)	
KRISTINA BROWN	)	
	)	
Plaintiff	)	Action No.
	)	<u>1:17-cv-06824-AT</u>
v.	)	
	)	
	)	
TV ONE LLC, SWIRL RECORDING & FILM INC.	)	
D/B/A SWIRL FILMS, INC., TRACEY BAKER-	)	
SIMMONS, WANDA SHELLEY and B2	)	
ENTERTAINMENT LLC and SIMMONS SHELLEY	)	
ENTERTAINMENT, LLC.	)	
Defendants	)	
	)	

**AFFIDAVIT OF ALICIA BROWN**

I, Alicia Brown ("Brown") state under the pains and penalty of perjury:

1. I am the wife and manager of Robert "Bobby" Brown, and a resident of the State of California.
2. Attached is an email I received from Krista Hayes, the Executive Producer of the Ed Lover and Monie Love radio show. It is a popular syndicated radio show, associated with Reach Media.
3. Reach Media and Radio One, Inc. are related entities and upon information and belief, Radio One, Inc. owns Tv One LLC or is a related entity.

4. The email states as follows:

Last week, we had a few actors in studio from TvOne to discuss the Bobbi Christina biopic, and we were told that the family was aware of the film and what it contains, however, I read an article this morning that said Mr. Brown was not in favor of the movie.

See Exhibit A.

Signed Under The Pains and Penalty of Perjury

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Alicia Brown

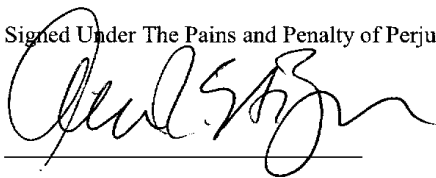
Dated: September 18, 2017

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Signed Under The Pains and Penalty of Perjury

A handwritten signature in black ink, appearing to read 'Alicia Brown', written over a horizontal line.

Alicia Brown

Dated: September 18, 2017

# EXHIBIT A

From: **Krista Hayes** <[krista.hayes@reachmediainc.com](mailto:krista.hayes@reachmediainc.com)>  
Date: Tue, Sep 12, 2017 at 7:08 AM  
Subject: The Ed Lover Show with Monie Love: Bobby Brown  
To: "[aemanagement123@gmail.com](mailto:aemanagement123@gmail.com)" <[aemanagement123@gmail.com](mailto:aemanagement123@gmail.com)>

Happy Tuesday, Alicia;

My name is Krista Hayes, Executive Producer of syndicated morning radio show ***"The Ed Lover Show with Monie Love."***

Show hosts and music industry veterans Ed Lover (of the late 80's *"Yo! MTV Raps"* fame) as well as golden-era hip-hop legend Monie Love broadcast out of Atlanta, Georgia to ten markets, with the list of affiliates growing rapidly (Philadelphia, Houston, Dallas, Atlanta, Indianapolis, etc.) the more we hit the airwaves.

Last week, we had a few actors in studio from TvOne to discuss the Bobbi Christina biopic, and we were told that the family was aware of the film and what it contains, however, I read an article this morning that said Mr. Brown was not in favor of the movie.

I would love for Mr. Brown to call in to clarify; again – our listeners would love to hear his side.

Please advise any availability Mr. Brown could call in, or if he is in the Atlanta area anytime, Ed and Monie would love to have him in-studio.

Thank you!

Best regards,

**Krista Hayes**

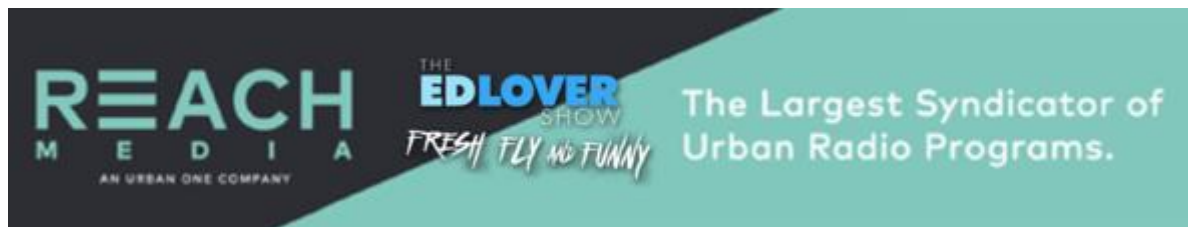
*Executive Producer*

The Ed Lover Show with Monie Love, Syndicated Morning Show

[www.EdLoverShow.com](http://www.EdLoverShow.com)

@EdLoverShow

[C] [\(859\) 536-2657](tel:(859)536-2657)



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**Alicia Etheredge-Brown**

**AE Management**

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